

Exhibit D

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION**

PGI POLYMER, INC.,

Plaintiff,

v.

CHURCH & DWIGHT CO., INC.
KARMIN GROUP a/k/a Le GROUPE
KARMIN,
KARMIN INDUSTRIES,
LAMI PRODUCTS, INC. and
BI-LO, LLC,

Defendants.

Civil Action No.:
3:15-CV-0214 (FDW)(DSC)

DECLARATION OF JAYSON ROY

I, Jayson Roy, declare as follows:

1. I am the Vice President, Corporate Controller & CAO to Southeastern Grocers, LLC. The facts set forth in this Declaration are personally known to me and I have firsthand knowledge thereof. If called as a witness, I could and would competently testify to all facts within my personal knowledge.

2. Southeastern Grocers, LLC is located at 5050 Edgewood Court, Jacksonville, FL 32254-3699, and has no physical presence in the state of North Carolina.

3. Southeastern Grocers, LLC is parent company to BI-LO, LLC, a defendant in the above-captioned action, and Samson Merger Sub, LLC, and Winn-Dixie Stores, Inc.

4. Southeastern Grocers, LLC has had no direct involvement in the marketing, distributing or sales of the alleged infringing goods at issue in this action. It is merely the holding company for

BI-LO, LLC, a defendant in the above-captioned action, and Samson Merger Sub, LLC (which owns Harveys) and Winn-Dixie Stores, Inc.

5. Harveys stores are located in Florida, Georgia, and South Carolina. There are no Harveys stores located in North Carolina.

6. Winn-Dixie stores are located in Alabama, Florida, Georgia, Louisiana and Mississippi. There are no Winn-Dixie stores located in North Carolina.

7. Southeastern Grocers, LLC does not maintain an office in North Carolina.

8. Southeastern Grocers, LLC does not own property in North Carolina.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed November 2, 2015.


Jayson Roy